

*Pickens County Branch of the NAACP, et al v. School District of Pickens County.*  
Civil Action No. 8:23-cv-01736-BHH

# Exhibit H

**To School District of Pickens County's Response in Opposition to Plaintiffs' Motion for  
Preliminary Injunction**

**Declaration of Karla Kelley**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
ANDERSON DIVISION**

Pickens County Branch of the NAACP;

Rebecca Turner and Brandon Turner, on behalf of  
minor children J.T. and G.T.;

Susanna Ashton and Peter Laurence on behalf of  
minor children H.L. and C.L.;

Reba Kruse and Derrick Kruse on behalf of minor  
children S.K. and R.K.,

Plaintiffs,

v.

School District of Pickens County,

Defendant.

Case No. 8:23-cv-01736-BHH

**DECLARATION OF KARLA KELLEY**

I, **KARLA G. KELLEY**, declare pursuant to 28 U.S.C. § 1746 as follows:

1. My name is Karla G. Kelley. I am over the age of 18 and am competent to make this declaration. I am a citizen and resident of South Carolina. The facts stated herein are true of my own personal knowledge, and if called to testify, I would so testify.
2. I am an Executive Vice President of Complete Commercial Solutions and have held this role since 2006.
3. I currently serve on the Board of Trustees of the School District of Pickens County. I have served on the Board since November 2018.
4. I voted on September 26, 2022 to remove the book *Stamped: Racism, Antiracism, and You* ("*Stamped*") from the curriculum, library, and media centers of School District of Pickens County high schools.
5. In deciding how to vote in that meeting on the motion to remove *Stamped*, I reviewed and considered the school-level and district-level committees' findings, conclusions, and recommendations regarding the use of *Stamped* in the curriculum, library, and media centers of the School District of Pickens County high schools.

6. In deciding how to vote in that meeting on the motion to remove *Stamped*, I carefully considered the rights, freedom, and responsibilities of students, parents/legal guardians, and teachers in the School District of Pickens County.
7. My recommendation and vote on the motion to remove *Stamped* were based on the school-level and district-level committees' reports, input from stakeholders, and my own independent evaluation of the book, its educational suitability, and the potential for disruption of the educational environment.
8. I do not object to including books, materials, ideas, or discussion in the curriculum and school libraries of the School District of Pickens County regarding race, racism, slavery, the civil rights movement, and historic or contemporary issues and tensions regarding race, racism, and justice, if those books, materials, ideas, or discussions are intellectually appropriate, age appropriate, and educationally suitable for the students of the School District of Pickens County.
9. My decision to vote on September 26, 2022 to remove *Stamped* from the curriculum, library, and media centers of School District of Pickens County high schools was the result of my analysis of the factual errors and omissions in *Stamped* and my conclusion that, as a result of these factual errors and omissions, the book is not intellectually appropriate or educationally suitable for students in the School District of Pickens County.
10. In a board meeting held July 6, 2023, I, along with the other members of the Board of Trustees, voted to allow student access to the book *Stamped* in high school libraries subject to parental consent. This decision mirrors a motion I made during the Board meeting of September 26, 2022. In the time since that meeting, the Board continued to discuss the issue, has considered the perspectives of new Board members, and has continued to evaluate input from parents and other stakeholders. I continue to have serious concerns regarding the book's factual errors and omissions, its lack of academic rigor, intellectual appropriateness, and educational suitability, and the potential for disruption to the educational environment. Nevertheless, after careful consideration and consultation, and in keeping with my view respecting parental authority over the education and upbringing of their children, I voted in the July 6, 2023 meeting to allow *Stamped* to be available in high school libraries with parental consent.
11. I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 6th day of July, 2023.

  
Karla Kelley